

EXHIBIT A

GLOWACKI v. HOWELL PUBLIC SCHOOL
DISTRICT, ET AL

WENDY S. HILLER

September 12, 2012

Prepared for you by



Bingham Farms/Southfield • Grand Rapids
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<p style="text-align: right;">Page 9</p> <p>1 T-shirt with white writing on it, and it said</p> <p>2 "Tyler's Army" on the front and it said "Fighting</p> <p>3 Evil With Kindness" on the back. And I wore it to</p> <p>4 school the next day to talk about how making kids</p> <p>5 feel safe was really important. And several of my</p> <p>6 colleagues and some students asked if I would make</p> <p>7 one for them, and I said I'd find out how much it</p> <p>8 would cost and all because I had just made the</p> <p>9 one.</p> <p>10 And then when the Anti-Bullying Day</p> <p>11 came out, I thought instead of making them in</p> <p>12 black and white, I'd make -- I'd make the ones</p> <p>13 that I was ordering in purple, and so it seemed to</p> <p>14 fit with the idea of anti-bullying.</p> <p>15 So I think I made 20, and I gave some</p> <p>16 of them to my daughters and their friends in Ann</p> <p>17 Arbor, and then I brought the rest up to Howell.</p> <p>18 And after school, I think it was the night before,</p> <p>19 and then before school, the day of the purple</p> <p>20 t-shirt day, I gave them to people who had asked</p> <p>21 for them and some people who hadn't asked for them</p> <p>22 but I just thought that I knew that they were</p> <p>23 against bullying and so I thought that it would be</p> <p>24 something they would be interested in.</p> <p>25 Q. So you said three weeks prior?</p>	<p style="text-align: right;">Page 11</p> <p>1 sex. It was sort a first date sort of thing. And</p> <p>2 when he found that out, he jumped off the George</p> <p>3 Washington Bridge and killed himself.</p> <p>4 Q. When he found out that there was a web cam set up</p> <p>5 in his room?</p> <p>6 A. Yeah.</p> <p>7 Q. And do you know if the web cam captured --</p> <p>8 A. It didn't.</p> <p>9 Q. -- footage of him?</p> <p>10 A. It didn't. It was turned off before. But he knew</p> <p>11 that everybody was waiting and watching to see</p> <p>12 that.</p> <p>13 Q. And you said that Tyler Clementi was from your</p> <p>14 hometown?</p> <p>15 A. He was from Ridgewood, New Jersey, which is where</p> <p>16 I lived when I was a little kid, and then he went</p> <p>17 to Rutgers.</p> <p>18 Q. And how did you hear about this story?</p> <p>19 A. I heard it on the radio.</p> <p>20 Q. And you said that evening after hearing about</p> <p>21 this --</p> <p>22 A. I called my daughter at school, and I was pretty</p> <p>23 broken up about it, and then I thought I just have</p> <p>24 to do something to stand up against the idea of</p> <p>25 kids being mean to each other, because at the high</p>
<p style="text-align: right;">Page 10</p> <p>1 A. I think it was about three weeks. I'd have to</p> <p>2 look at the date that Tyler Clementi committed</p> <p>3 suicide, but I think it was about two or three</p> <p>4 weeks before that, and then after that, the press</p> <p>5 about all the kids who had committed suicide</p> <p>6 recently in that time period sort of came up, but</p> <p>7 it was Tyler's death that really struck a chord</p> <p>8 with me, because he was so new as a freshman in</p> <p>9 college, and when his roommates and friends</p> <p>10 bullied him, he killed himself. And he was from</p> <p>11 my old hometown, and so -- though I didn't know</p> <p>12 him. I was a little kid in that town, but it just</p> <p>13 hit me hard.</p> <p>14 Q. And you're saying two to three weeks prior to the</p> <p>15 20th of October?</p> <p>16 A. Right. It was in September, I'm pretty sure.</p> <p>17 Q. And what are the facts and circumstances</p> <p>18 surrounding Tyler Clementi committing suicide?</p> <p>19 A. There was a court case on it recently. He was a</p> <p>20 freshman. He had just gone off to Rutgers, and</p> <p>21 his roommate -- as far as I understand it, his</p> <p>22 roommate and some other friends of the roommate</p> <p>23 set up a web cam in his room without his knowledge</p> <p>24 to -- and told their friends to watch him having a</p> <p>25 homosexual encounter. I don't even think it was</p>	<p style="text-align: right;">Page 12</p> <p>1 school, we deal with hurt feelings of kids all the</p> <p>2 time, and so I thought I have to do something, and</p> <p>3 I felt very helpless, and so I called a T-shirt</p> <p>4 place in town, in Ann Arbor, where I live, and I</p> <p>5 said can you make a T-shirt while I wait, and I</p> <p>6 thought about what I wanted it to say, and I</p> <p>7 wanted to -- I wanted to mention Tyler but I</p> <p>8 really wanted it to be an anti-bullying statement,</p> <p>9 and so that's why it said "Fighting Evil With</p> <p>10 Kindness."</p> <p>11 Q. Did you believe that Tyler Clementi had been</p> <p>12 targeted because he was homosexual?</p> <p>13 A. I don't know. At the time I was really thinking</p> <p>14 of it as a kind of bullying that kids do to each</p> <p>15 other, because I know that he was kind of a nerdy</p> <p>16 kid, and I think sometimes people just make fun of</p> <p>17 kids for all different reasons. I think the fact</p> <p>18 that he was gay may have had to do with it, but I</p> <p>19 certainly don't know if it was a hate crime. I</p> <p>20 just know that it was a really cruel thing to do.</p> <p>21 Q. And what was the name of the T-shirt place that</p> <p>22 you went to in Ann Arbor?</p> <p>23 A. Elmo's.</p> <p>24 Q. Could you spell that.</p> <p>25 A. E-l-m-o apostrophe s.</p>

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<p style="text-align: right;">Page 13</p> <p>1 Q. And when you wore the T-shirt the next day to 2 school, what was the reaction you received?</p> <p>3 A. Well, most people didn't say anything. They 4 didn't know what it was at all. Some people said, 5 who's Tyler or what's Tyler's Army, and so, you 6 know, I told them what had happened, and one of 7 the reasons I called it Tyler's Army was, you 8 know -- you had asked about whether I think he had 9 been targeted for his homosexuality. I think that 10 was a piece of it but not the most important 11 thing, and I called it Tyler's Army. The idea of 12 Tyler's Army came from, in a kids' book, Harry 13 Potter, where they fight against evil, and they 14 called it Dumbledore's Army, and Dumbledore's Army 15 fights against evil, and after the Harry Potter 16 books were all over, the author, J.K. Rowling, was 17 asked about Dumbledore, and she said that in her 18 mind, Dumbledore was homosexual, but that she 19 never mentioned it in the books because it really 20 wasn't important. It wasn't what he was about. 21 It had nothing to do with the story. And so 22 that's really why I chose to call this Tyler's 23 Army, because, yes, he's homosexual, but that's 24 not what this was really about. This was really 25 about bullying, and to stand up against bullying,</p>	<p style="text-align: right;">Page 15</p> <p>1 A. I didn't, because I didn't think it was a 2 controversial issue. I thought anti-bullying 3 is -- I mean, it's a little like being for, you 4 know, puppies and rainbows. I didn't see it as 5 controversial.</p> <p>6 Q. Now, after you wore the black T-shirt to school, 7 when did you start receiving responses about 8 creating a T-shirt for Anti-Bullying Day?</p> <p>9 A. It was never -- it was never asking about creating 10 a T-shirt for Anti-Bullying Day.</p> <p>11 Q. Okay.</p> <p>12 A. That's never what it was.</p> <p>13 Q. Can you correct me.</p> <p>14 A. Yes. I created the T-shirt on my own. Some 15 people asked if I would have one printed for them. 16 I was trying to find out prices of what it would 17 cost depending on how many I ordered and what 18 color I should make it and whether it should have 19 V-neck, and that's when I heard about the 20 Anti-Bullying Day and I thought, I'll make them in 21 purple. It was never creating a T-shirt for 22 Anti-Bullying Day.</p> <p>23 Q. Okay. So I guess when was it that you found out 24 about Anti-Bullying Day, period?</p> <p>25 A. I don't remember. I think I heard about it first</p>
<p style="text-align: right;">Page 14</p> <p>1 whether you're straight or gay or whatever, is 2 really what I was aiming for.</p> <p>3 Q. So how many people would you say asked about the 4 T-shirt that you were wearing?</p> <p>5 A. Gosh, I couldn't say. Maybe 10, but that's a 6 guess.</p> <p>7 Q. Were any of the people on the administration of 8 the school?</p> <p>9 A. No. They were -- it was teachers and students.</p> <p>10 Q. Did you have any concern that bringing up the 11 issue or wearing the T-shirt would cause 12 questions for the students to pose to you?</p> <p>13 A. I don't know what you mean.</p> <p>14 Q. Did you think that wearing the T-shirt -- the 15 Tyler's Army T-shirt might start questioning from 16 students as to why you were wearing the T-shirt?</p> <p>17 A. Yes.</p> <p>18 Q. And what were your thoughts on that?</p> <p>19 A. Well, I thought the message of anti-bullying was 20 important, and so I didn't really see that as a 21 controversial issue. I don't know anybody who 22 thinks people should be bullied into committing 23 suicide.</p> <p>24 Q. And did you believe that you should ask anyone in 25 administration prior to bringing up such a topic?</p>	<p style="text-align: right;">Page 16</p> <p>1 on the radio or on Facebook. I'm not sure which.</p> <p>2 Q. What was your understanding of what Anti-Bullying 3 Day was?</p> <p>4 A. It was against bullying. It was -- particularly 5 because there had been this sort of rash of 6 suicides or at least the publication about them, 7 it was time to stand up and say let's make -- 8 let's be nice, let's stand up against bullying of 9 all kinds. And though it was presented from the 10 gay community, I never saw it as a gay issue. I 11 always saw it as a Anti-Bullying Day. So, again, 12 I didn't see it as controversial because I don't 13 know anyone who's for bullying.</p> <p>14 Q. When you say "rash of suicides," what are you 15 talking about?</p> <p>16 A. There were several suicides across the country -- 17 I don't know the number -- between September and 18 October of that year. There were, I think -- I 19 think maybe four or five that were publicized, 20 kids who had been targeted, most of them because 21 they were gay, some of them because they were 22 perceived as gay or just different, and some of 23 them as young as, I think, 12 years old. And they 24 committed suicide and so there had been a lot of 25 press about that. We had been really taking a</p>